

SHER TREMONTE LLP

September 7, 2022

BY ECF AND FAX

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Upon reconsideration,
defendant's request to
travel is granted.
So Ordered.

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

M. K. Hellerstein
9-8-2022

Dear Judge Hellerstein:

We write on behalf of our client, Jona Rechnitz, to respectfully request that Your Honor reconsider the denial of our August 29, 2022 request that Mr. Rechnitz be permitted to travel to Japan for business. Earlier today, the Court denied the request stating that "Defendant's travels are of a degree that makes this application inconsistent with the purpose of supervised release." We respectfully request reconsideration of the Court's order for several reasons.

First, Mr. Rechnitz is not on supervised release. Rather, he is on bond awaiting the resolution of his appeal at the conclusion of which, if unsuccessful, he will surrender to serve the sentence Your Honor imposed. The primary consideration for whether to grant a temporary modification of the conditions of release to permit international travel is whether Mr. Rechnitz is a flight risk. He is not. Indeed, Mr. Rechnitz has returned from every previous international trip he has taken – all of which Your Honor approved – and has kept in close contact with the government and the Court through counsel.

Second, the trip in question represents an important business opportunity that will allow Mr. Rechnitz to continue to make a living and to save money to pay his restitution obligation, should the Second Circuit affirm the Court's restitution order. Mr. Rechnitz is responsible for the sponsorships for a well-known professional boxer who is appearing for a fight in Japan. The fight itself will take place after Mr. Rechnitz returns on September 24th, which he is doing in order to be able to spend Rosh Hashana with his family. Mr. Rechnitz's presence is essential, however, for the sponsorship deals to be consummated ahead of the fight, and thus he hopes to travel just before Rosh Hashana so he can complete his work obligations and return home in time for the holiday.

Third, in order to travel to Japan on business, Mr. Rechnitz must be sponsored by a company doing business with him there to receive a visa. A Japanese mixed martial arts organization has provided such sponsorship and his visa application is pending.

Hon. Alvin K. Hellerstein
September 7, 2022
Page 2

Fourth, as noted in our amended August 29, 2022 request, the government has consented to the travel, as it has consented to all prior request for travel, which this Court has approved without raising any concerns.

We fully respect the Court's decision but respectfully request that Your Honor consider the foregoing facts, which we regret we did not provide in sufficient detail in our previous letters. This trip is very important to our client and his financial prospects, as he has been working hard to get back on his feet since the events of this case. He accordingly wishes us to convey his sincere hope that Your Honor will reconsider. As previously noted, he will provide his wife's passport for the duration of the travel. We appreciate the Court's consideration.

Respectfully submitted,

/s/Noam Biale

Michael Tremonte
Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel of record (by ECF)